

PACIFIC GAS & ELECTRIC COMPANY
GENERAL ORDER 165 COMPLIANCE PLAN FOR 2003
AND ANNUAL COMPLIANCE REPORT FOR 2001
SUBMITTED PURSUANT TO CPUC DECISION NO. 97-03-070

July 1, 2002

**PACIFIC GAS & ELECTRIC COMPANY
GENERAL ORDER 165 COMPLIANCE PLAN FOR 2003
AND ANNUAL COMPLIANCE REPORT FOR 2001**

Pursuant to Section IV of the California Public Utilities Commission's (Commission) General Order (G.O.) 165, adopted in Decision No. (D.) 97-03-070, Pacific Gas & Electric Company (PG&E) submits its compliance plan for distribution facilities inspection activities in 2003. Attached as Appendix A is the Compliance Plan, which describes how PG&E intends to comply in 2003 with the requirements set forth in G.O. 165. This plan sets forth the anticipated activities PG&E will undertake to comply with G.O. 165. While events in the field may cause variations in the quarterly schedules for system patrols and inspections, the planned results by the end of the year are anticipated to meet the requirements of G.O. 165. Attached as Appendix B is the Annual Report for 2001.

The numbers of overhead and underground distribution facilities referred to in this report are necessarily based on estimates. PG&E's overhead and underground electric system is complex and dynamic. Equipment quantities and system configurations change continually. These changes occur as a result of adding and removing equipment to accommodate new customer connections and load growth, requests from customers and Local City/and or Governmental Agencies to relocate facilities, the sale and/or acquisition of existing distribution systems, the retirement of aging plant, etc.

APPENDIX A

COMPLIANCE PLAN

I. PATROLS FOR OVERHEAD AND UNDERGROUND FACILITIES

Patrols will be performed in the course of company business by qualified personnel. The primary lines patrolled will be recorded on patrol maps. Progress reports will be prepared by operating areas indicating the number of overhead poles and the number of underground enclosures patrolled. Significant abnormal conditions will be documented on a maintenance tag and entered into a computerized maintenance system. Maintenance tags will be scheduled for correction in accordance to PG&E's Electric Preventive Maintenance Plan. For 2003, PG&E will be patrolling 100% of its electric urban distribution facilities and in parts of its system will begin transitioning to perform 50% of its electric rural distribution facilities each year.

COMPLIANCE PLAN (Cont.)

II. DETAILED INSPECTIONS SCHEDULED FOR 2003¹

A. OVERHEAD² FACILITIES

<i>Number of Poles by Area/Division³</i>	<i>Jan. - Mar.</i>	<i>Apr. - Jun.</i>	<i>Jul. - Sep.</i>	<i>Oct. - Dec.</i>	Total
Central Coast	6,372	9,564	9,558	0	25,494
De Anza	6,912	2,167	0	0	9,079
Diablo	3,729	3,729	3,727	1,242	12,427
East Bay	2,502	2,505	2,506	2,502	10,015
Fresno	10,002	15,000	15,003	10,002	50,007
Kern	6,459	6,458	6,456	6,456	25,829
Los Padres	5,010	5,010	5,210	5,168	20,398
Mission	2,630	3,946	3,948	2,631	13,155
North Bay	5,007	5,007	5,007	5,010	20,031
North Coast	11,784	11,784	11,784	7,856	43,208
North Valley	9,500	12,500	12,000	5,358	39,358
Peninsula	4,286	4,286	4,286	4,285	17,143
Sacramento	4,287	4,287	4,287	4,285	17,146
San Francisco	2,010	2,010	2,010	1,005	7,035
San Jose	3,681	3,681	3,681	1,227	12,270
Sierra	10,500	13,500	13,000	3,477	40,477
Stockton	7,000	9,700	9,700	6,800	33,200
Yosemite	13,023	16,047	16,047	10,698	55,815
Total	114,694	131,181	128,210	78,002	452,087

¹ The quarterly system inspection schedules are estimates in which events in the field may cause variations; the planned results by the end of the year are anticipated to meet the requirements of G.O. 165.

² Overhead inspections will be performed on Transformers, Switching/Protective Devices, Regulators/Capacitors, Overhead Conductors and Cables.

³ Reporting of overhead facilities was converted from miles of line to number of poles starting in 1999.

COMPLIANCE PLAN (Cont.)

B. UNDERGROUND⁴ FACILITIES

<i>Number of Enclosures by Area/Division</i>	<i>Jan. - Mar.</i>	<i>Apr. - Jun.</i>	<i>Jul. - Sep.</i>	<i>Oct. - Dec.</i>	Total
Central Coast	942	1,413	1,413	7	3,775
De Anza	1,635	1,635	1,279	0	4,549
Diablo	2,634	2,634	2,632	877	8,777
East Bay	1,164	1,164	1,164	1,164	4,656
Fresno	1,551	2,328	2,330	1,551	7,760
Kern	744	744	741	741	2970
Los Padres	696	696	696	696	2784
Mission	2,368	3,552	3,555	2,370	11,845
North Bay	1,083	1,083	1,083	1,085	4,334
North Coast	1,626	1,626	1,626	1,084	5,962
North Valley	550	800	900	510	2760
Peninsula	1,659	1,658	1,658	1,658	6,633
Sacramento	1,395	1,395	1,395	1,400	5,585
San Francisco	1,110	1,110	1,110	549	3,879
San Jose	2,448	2,448	2,448	816	8,160
Sierra	0	1,800	1,000	885	3,685
Stockton	850	1,300	1,400	1,042	4,592
Yosemite	405	810	810	301	2326
Total	22,860	28,196	27,240	16,736	95,032

⁴ Underground inspections will be performed on Transformers, Switching/Protective Devices, Regulators/Capacitors, and Padmounted equipment.

COMPLIANCE PLAN (Cont.)

III. INTRUSIVE WOOD POLE INSPECTIONS SCHEDULED FOR 2003⁵,

Number of Poles	Jan. - Mar.	Apr. - Jun.	Jul. - Sep.	Oct. - Dec.	Total ⁶
System	15,000	21,000	21,000	21,000	78,000

⁵ PG&E is currently conducting a wood pole test and treat program of poles over 10 years old. The program began in November, 1994.

⁶ Total does not include poles scheduled in prior years and rescheduled into year 2003. PG&E plans to test and treat a total of approximately 233,500 poles in 2003. For a complete summary of PG&E's 10-year Pole Test and Treat program and progress report, see PG&E's compliance filing submitted pursuant to Ordering Paragraph 21 of Decision No. 99-06-080 to the Energy Division.

2001 ANNUAL REPORT

I. PATROLS**A. OVERHEAD PATROLS:**

	Number of Poles Scheduled for Patrol	Number of Poles not Patrolled	Reason patrol was not completed	Date patrol will be completed
Urban/ Rural	699,612	13,788	<p>The poles indicated as not being patrolled are a result of the following:</p> <ol style="list-style-type: none"> 1) The scheduled patrols in 2001 were based on estimates; the actual number completed was less than the estimate. 2) Some rural poles were included in the 2001 estimated schedule, which were not patrolled, and not required to be patrolled. Only patrols on urban facilities were required in 2001. 3) Poles scheduled for patrols were inspected instead. 4) Poles have been either sold or removed from the system. 	No date necessary since requirement was met.

B. UNDERGROUND PATROLS:

	Number of Enclosures Scheduled for Patrol	Number of Enclosures not Patrolled	Reason patrol was not completed	Date patrol will be completed
Urban/ Rural	136,559	0	Not applicable	

2001 ANNUAL REPORT (Cont.)

II. DETAILED INSPECTIONS

A. OVERHEAD⁷ FACILITIES:

Area/ Division	Number of Poles Scheduled for Inspection	Number of Poles not Inspected	Reason inspection was not completed	Date by which inspections will be completed
Central Coast	30,725	5,104	The actual number of poles inspected was less than the estimated. ⁸	No date necessary since requirement was met.
De Anza	9,760	0	Not applicable	
Diablo	12,442	0	Not applicable	
East Bay	12,269	0	Not applicable	
Fresno	57,408	559	The actual number of poles inspected was less than the estimated.	No date necessary since requirement was met.
Kern	28,868	2,382	The actual number of poles inspected was less than the estimated.	No date necessary since requirement was met.
Los Padres	20,527	0	Not applicable	
Mission	11,798	25	The actual number of poles inspected was less than the estimated.	No date necessary since requirement was met.
North Bay	15,434	3	The difference is due to the removal of idle facilities.	No date necessary.
North Coast	34,615	0	Not applicable	
North Valley	49,425	634	The actual number of poles inspected was less than the estimated.	No date necessary since requirement was met.
Peninsula	13,498	0	Not applicable	
Sacramento	24,852	2,895	The actual number of poles inspected was less than the estimated.	No date necessary since requirement was met.
San Francisco	7,700	205	The actual number of poles inspected was less than the estimated.	No date necessary since requirement was met.
San Jose	12,221	0	Not applicable	
Sierra	43,661	3,873	The actual number of poles inspected was less than the estimated.	No date necessary since requirement was met.
Stockton	31,463	0	Not applicable	
Yosemite	47,414	0	Not applicable	
Total	464,080	15,680		

⁷ Overhead inspections include inspections of Transformers, Switching/Protective Devices, Regulators/Capacitors, Overhead Conductors and Cables.

⁸ See discussion of estimating practices on page 1 of this report.

2001 ANNUAL REPORT (Cont.)

B. UNDERGROUND⁹ FACILITIES:

Area/ Division	Number of Enclosures Scheduled for Inspection	Number of Enclosures not Inspected	Reason inspection was not completed	Date by which inspections will be completed
Central Coast	3,997	0	Not applicable	
De Anza	4,000	501	The initial inspection plan for 2001 was changed and these inspections were rescheduled for 2002. This schedule complies with the inspection cycles in GO 165.	12/31/2002
Diablo	8,509	0	Not applicable	
East Bay	4,455	295	The actual number of enclosures inspected was less than the estimated.	No date necessary since requirement was met.
Fresno	7,166	0	Not applicable	
Kern	4,390	0	Not applicable	
Los Padres	1,812	0	Not applicable	
Mission	8,922	0	Not applicable	
North Bay	3,955	0	Not applicable	
North Coast	7,056	0	Not applicable	
North Valley	3,130	0	Not applicable	
Peninsula	4,440	181	The actual number of enclosures inspected was less than the estimated.	No date necessary since requirement was met.
Sacramento	5,136	75	The actual number of enclosures inspected was less than the estimated.	No date necessary since requirement was met.
San Francisco	5,300	679	The actual number of enclosures inspected was less than the estimated.	No date necessary since requirement was met.
San Jose	8,192	401	The actual number of enclosures inspected was less than the estimated.	No date necessary since requirement was met.
Sierra	5,230	682	The actual number of enclosures inspected was less than the estimated.	No date necessary since requirement was met.
Stockton	4,720	0	Not applicable	
Yosemite	2,738	0	Not applicable	
Total	93,14893,148	2814		

⁹ Underground inspections include inspections of Transformers, Switching/Protective Devices, Regulators/Capacitors, and Padmounted equipment.

2001 ANNUAL REPORT (Cont.)

C. IDENTIFIED CONDITIONS¹⁰ IN 2001:

Facilities*	Estimated ¹¹ quantity	Corrective Action Required				No Corrective Action Required	
		Grade 1 ^A		Grade 2 ^B			
		Number	Percent	Number	Percent	Number	Percent
Transformers							
Overhead	785,702	3,275	0.4%	2,522	0.3%	779,905	99.3%
Underground**	171,064	504	0.3%	2,088	1.2%	168,472	98.5%
Switches/ Disconnects							
Overhead	147,423	964	0.7%	1,821	1.2%	144,638	98.1%
Underground	94,451	63	0.1%	439	0.5%	93,949	99.4%
Protective Devices ¹²							
Overhead	4,172	98	2.4%	743	17.8%	3,331	79.8%
Underground	635	7	1.1%	24	3.8%	604	95.1%
Voltage Regulation ¹³							
Overhead	13,924	129	0.9%	1,516	10.9%	12,279	88.2%
Underground	N/A ¹⁴	2	N/A	33	N/A	N/A	N/A
Conductors & Cables							
Overhead ¹⁵	N/A	8,633	N/A	23,619	N/A	N/A	N/A
Underground ¹⁶	N/A	2,339	N/A	8,768	N/A	N/A	N/A

*Multiple conditions at one location are reported in the facility category that is prioritized as the most serious among a ranking of system conditions. The scheduled repair date is the earliest determined for all the conditions identified at the location.

**Underground categories include padmounted equipment.

^A Grade 1 is defined as a condition requiring urgent and immediate response and continued action until the condition is repaired or no longer presents a potential hazard.

^B Grade 2 is defined as a condition requiring timely corrective action to mitigate an existing condition which, at the time of identification, does not present an immediate hazard to third parties, company employees or property.

¹⁰ Conditions listed in this section of the Report include conditions identified during patrols and inspections conducted only in 2001.

¹¹ These values represent the total estimated number of facilities, in each category, for the electric distribution system. The category labeled Switches/Disconnects includes fuses. Protective Device category includes reclosures, overhead sectionalizers, underground interrupters, and underground sectionalizers. The Voltage Regulation category includes boosters, capacitors, regulators and stepdown transformers.

¹² PG&E's database does not distinguish between overhead and underground reclosures. The total number of facilities listed as overhead reflects both overhead and underground reclosures. The number of Lightning Arrestors installed on the distribution system is not available, and therefore not included in the "estimated quantity" of Protective Devices. However, conditions associated with lightning arrestors are included in the "Corrective Action Required" column.

¹³ PG&E's database does not distinguish between overhead and underground voltage regulation facilities. The total number of facilities listed as overhead reflects both overhead and underground.

¹⁴ N/A means "not available."

¹⁵ In addition to OH conductor, conditions reported in this table include Grounds, Jumpers & Connectors, Pole Hardware, and Guying.

¹⁶ In addition to UG cable, conditions reported in this table include Grounds, Hardware, and Connectors.

2001 ANNUAL REPORT (Cont.)

D. CORRECTIVE ACTION SCHEDULED FOR 2001¹⁷:

Facilities	Conditions scheduled for correction	Number of facilities		Number of facilities		Reason why correction was not completed	Date ¹⁸ correction will be completed
		Corrected ¹⁹	Percentage	Not Corrected	Percentage		
Transformers							
Overhead	2,441	2,441	100%	0	0%	Not applicable	
Underground	1,389	1,389	100%	0	0%	Not applicable	
Switches/ Protective Devices (Disconnects)							
Overhead	3,436	3,436	100%	0	0%	Not applicable	
Underground	356	356	100%	0	0%	Not applicable	
Regulators/ Capacitors (Voltage Regulation)							
Overhead	1,339	1,339	100%	0	0%	Not applicable	
Underground	7	7	100%	0	0%	Not applicable	
Conductors & Cables							
Overhead ²⁰	32,891	32,885	99.9%	6	0.1%	Reason below	11/2002
Underground ²¹	9,995	9,995	100%	0	0%	Not applicable	

Reason why corrections were not completed:

Four tags contained incorrect information in the database. Two of the four tags had actually been completed in 2001, and two are complete but the date complete is unknown. For the remaining two tags; one tag had construction delayed as a result of bad weather, and the other tag had a property owner who would not allow access to the facilities.

¹⁷ Table includes conditions that were identified in year 2001 and prior years.

¹⁸ Represents the latest date that any condition in the respective category is scheduled for completion. Conditions may be corrected earlier than indicated.

¹⁹ A facility, reported as corrected, may have been repaired, replaced, cleaned, adjusted, removed, re-evaluated, or received other appropriate action.

²⁰ In addition to OH conductor, conditions reported in this table include Grounds, Jumpers & Connectors, Pole Hardware, and Guying.

²¹ In addition to UG cable, conditions reported in this table include Grounds, Hardware, and Connectors.

2001 ANNUAL REPORT (Cont.)

E. CORRECTIVE ACTION SCHEDULED FOR 2002:

	Number of Grade 2 Conditions Identified in 2001	Total ²² Conditions Scheduled for 2002	Percentage of Grade 2 Conditions Identified in 2001
Transformers	4,610	3,541	76.8%
Switching/Protective Devices	3,027	1,797	59.4%
Regulators/ Capacitors	1,549	538	34.7%
Overhead Conductor and Cable ²³	32,387	25,047	77.3%

F. CORRECTIVE ACTION SCHEDULED FOR 2003:

	Number of Grade 2 Conditions Identified in 2001	Total ²⁴ Conditions Scheduled for 2003	Percentage of Grade 2 Conditions Identified in 2001
Transformers	4,610	1,020	22.1%
Switching/Protective Devices	3,027	423	14.0%
Regulators/ Capacitors	1,549	49	3.2%
Overhead Conductor and Cable ²⁵	32,387	8,315	25.7%

²² Table includes conditions that were identified in year 2001 and prior years.

²³ In addition to OH conductor, conditions reported in this table include Grounds, Jumpers & Connectors, Pole Hardware, and Guying. In addition to UG cable, conditions reported in this table include Grounds, Hardware, and Connectors.

²⁴ See footnote 22.

²⁵ See footnote 23.

2001 ANNUAL REPORT (Cont.)

III. INTRUSIVE INSPECTION

A. WOOD POLES²⁶:

Number of Wood Poles by Area/ Division	Wood Poles Scheduled for Inspection	Wood Poles not Inspected	Reason inspection was not completed	Date inspection will be completed ²⁷
Central Coast	0	0	Not applicable	
De Anza	0	0	Not applicable	
Diablo	0	0	Not applicable	
East Bay	0	0	Not applicable	
Fresno	0	0	Not applicable	
Kern	30,504	0	Not applicable	
Los Padres	0	0	Not applicable	
Mission	0	0	Not applicable	
North Bay	0	0	Not applicable	
North Coast	0	0	Not applicable	
North Valley	9,175	0	Not applicable	
Peninsula	0	0	Not applicable	
Sacramento	0	0	Not applicable	
San Francisco	0	0	Not applicable	
San Jose	0	0	Not applicable	
Sierra	0	0	Not applicable	
Stockton	0	0	Not applicable	
Yosemite	0	0	Not applicable	
Total	39,679	0		

²⁶ Table does not include poles that have been re-scheduled from prior years. Actual completed inspection performed in 2001 were 215,004 poles.

²⁷ Represents the latest date that any condition in the respective category is scheduled for completion. Conditions may be corrected earlier than indicated.

2001 ANNUAL REPORT (Cont.)

B. IDENTIFIED CONDITIONS IN 2001:

Facilities	Number of Wood Poles ³⁰	Corrective Action Required ²⁸				No Corrective Action Required	
		Grade 1 ^A		Grade 2 ^{B,29}			
		Number	Percent	Number	Percent	Number	Percent
Wood Poles	2,175,438	1,661	0.08%	26,082	1.2%	2,147,695	98.72%

^A Grade 1 is defined as a condition requiring urgent and immediate response and continued action until the condition is repaired or no longer presents a potential hazard.

^B Grade 2 is defined as a condition requiring timely corrective action to mitigate an existing condition which, at the time of identification, does not present an immediate hazard to third parties, company employees or property.

²⁸ Wood pole corrective conditions include those from all sources of identification and not exclusively the intrusive inspections. Example: Grade 1 conditions include pole repairs due to car/pole accidents.

²⁹ Includes poles that may subsequently be determined, after an engineering evaluation, as not needing corrective action.

³⁰ This value represents the total estimated number of wood poles in the electric distribution system.

2001 ANNUAL REPORT (Cont.)

C. CORRECTIVE ACTION SCHEDULED FOR 2001³¹:

Facilities	Poles scheduled for correction	Number of Wood Poles		Number of Wood Poles		Date correction will be completed
		Corrected ³²	Percentage	Not corrected	Percentage	
Wood Poles	9,388	9,388	100%	0	0%	Not applicable

D. CORRECTIVE ACTION SCHEDULED FOR 2002:

Facilities	Number of Grade 2 Poles Identified in 2001	Number of Poles Scheduled for Corrective Action in 2002 ³³	Percentage of Grade 2 Poles Identified in 2001
Wood Poles	26,082	18,316	70.2%

E. CORRECTIVE ACTION SCHEDULED FOR 2003:

Facilities	Number of Grade 2 Poles Identified in 2001	Number of Poles Scheduled for Corrective Action in 2003 ³⁴	Percentage of Grade 2 Poles Identified in 2001
Wood Poles	26,082	4,556	17.5%

³¹ Table includes conditions that were identified in year 2001 and prior years.

³² A facility, reported as corrected, may have been repaired, replaced, adjusted, removed, re-evaluated, or received other appropriate action.

³³ See footnote 31.

³⁴ See footnote 31.

2001 ANNUAL REPORT (Cont.)

F. CORRECTIVE ACTION SCHEDULED FOR 2004:

Facilities	Number of Grade 2 Poles Identified in 2001	Number of Poles Scheduled for Corrective Action in 2004 ³⁵	Percentage of Grade 2 Poles Identified in 2001
Wood Poles	26,082	1,000	3.8%

G. CORRECTIVE ACTION SCHEDULED FOR 2005:

Facilities	Number of Grade 2 Poles Identified in 2001	Number of Poles Scheduled for Corrective Action in 2005 ³⁶	Percentage of Grade 2 Poles Identified in 2001
Wood Poles	26,082	11,690	44.8%

H. CORRECTIVE ACTION SCHEDULED FOR 2006:

Facilities	Number of Grade 2 Poles Identified in 2001	Number of Poles Scheduled for Corrective Action in 2006 ³⁷	Percentage of Grade 2 Poles Identified in 2001
Wood Poles	26,082	6,996	26.8%

I. CORRECTIVE ACTION SCHEDULED FOR 2007:

Facilities	Number of Grade 2 Poles Identified in 2001	Number of Poles Scheduled for Corrective Action in 2007 ³⁸	Percentage of Grade 2 Poles Identified in 2001
Wood Poles	26,082	4,203	16.1%

³⁵ Table includes conditions that were identified in year 2001 and prior years.

³⁶ See footnote 35.

³⁷ See footnote 35.

³⁸ See footnote 35.

2003 COMPLIANCE PLAN - APPENDIX A

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